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and the Potential Class*

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NORTHERN CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 COURTNEY MCMILLIAN and RONALD
13 COOPER, on behalf of themselves and all others
similarly situated,

14 Plaintiffs,

15 v.

16 X CORP., f/k/a/ TWITTER, INC.,
17 X HOLDINGS, ELON MUSK, DOES,

18 Defendants.

Case No. 3:23-cv-03461-TLT-RMI

**DECLARATION OF KRISTI
STAHNKE MCGREGOR
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO
DEFENDANTS' MOTION TO
STAY DISCOVERY**

Judge: Trina L. Thompson
Magistrate Judge: Robert M. Illman

19
20 **DECLARATION OF KRISTI S. MCGREGOR**

21 I, Kristi Stahnke McGregor, declare and state as follows:

- 22 1. I am an attorney at Sanford Heisler Sharp, LLP, and represent Plaintiffs Courtney
23 McMillian and Ronald Cooper in this case. I am admitted *pro hac vice* before this Court.
24 I submit this declaration pursuant to L.R. 7-3(a) in support of Plaintiffs' Opposition to
25 Defendants' Motion to Stay Discovery. I have personal knowledge of the facts stated
26 herein and could competently testify to them if called to do so.
27

28 Case No. 3:23-cv-03461-TLT-RMI

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- 1 2. Attached hereto as Exhibit A is a list of cases filed against Twitter, X Corp., and/or Elon
2 Musk by employees terminated after the company's acquisition by Elon Musk. The
3 information provided is based on a review of publicly available dockets for each case.
- 4 3. Attached hereto as Exhibit B is an unaltered, accurate reproduction of an article published
5 by Forbes on or about August 29, 2023 titled *Elon Musk's X Is Facing 2,200 Arbitration*
6 *Cases From Ex-Twitter Employees* available at:
7 [https://www.forbes.com/sites/roberthart/2023/08/29/elon-musks-x-is-facing-2200-](https://www.forbes.com/sites/roberthart/2023/08/29/elon-musks-x-is-facing-2200-arbitration-cases-from-ex-twitter-employees/?sh=5246595665d0)
8 [arbitration-cases-from-ex-twitter-employees/?sh=5246595665d0](https://www.forbes.com/sites/roberthart/2023/08/29/elon-musks-x-is-facing-2200-arbitration-cases-from-ex-twitter-employees/?sh=5246595665d0) .
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- 10 4. Attached hereto as Exhibit C is a PDF of an unaltered screenshot from the Westlaw
11 docket of *Arnold et al v. X Corp. et al* demonstrating the Court's oral order dated October
12 16, 2023.
- 13 5. I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.
15 Executed this 5th day of April 2024 in Birmingham, Alabama.
16

17
18 DATED: April 5, 2024

Respectfully submitted,

Sanford Heisler Sharp, LLP

By: /s/ Kristi Stahnke McGregor

Kristi S. McGregor, GA Bar No. 674012
(admitted *pro hac vice*)

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